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17           ***Attorneys for Defendant JB Hunt Transport, Inc.  
and Stephen R. Palacios***

18           **UNITED STATES DISTRICT COURT  
19           DISTRICT OF NEVADA**

20      JULIO CHIQUIN, an individual;  
21      JOAQUINA CHIQUIN, an individual;  
22      JUAN CARLOS DE PAZ-OCHOA, an  
23      individual; NINFA X. MAAS, an  
24      individual; NINFA X. MAAS, on  
25      behalf her minor child, J.D.P.,

26           Plaintiff,

27      v.

28      J.B. HUNT TRANSPORT, INC., a  
29      foreign corporation; STEPHEN R.  
30      PALACIOS, an individual; DOES I-X,  
31      inclusive, and ROE CORPORATIONS  
32      I-X, inclusive,

33           JB Hunt.

34           2:21-cv-02119-JAD-DJA

35           **STIPULATION TO EXTEND TIME  
36           FOR DEFENDANTS TO FILE THEIR  
37           RESPONSE TO PLAINTIFFS'  
38           MOTION FOR REMAND**

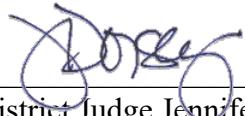
39           **(First Request)**

40           ECF Nos. 12, 14

41           Pursuant to LR IA 6-1, Plaintiffs and Defendants stipulate and agree to extend the time for  
42      Defendants to file their Response to Plaintiffs' Motion to Remand (the "Motion") by fourteen (14)  
43      days, until January 20, 2022. The current deadline is today, January 6, 2022. The parties are engaged  
44      in settlement negotiations that could result in a resolution of this matter and avoid the need for this  
45      Court to consider the Motion. The parties agreed that while such negotiations are underway,

1 Defendants should be allowed additional time for the preparation of its Response since the filing of  
2 such a brief ultimately may not be necessary. Should the negotiations not result in the resolution of this  
3 matter, Defendants do intend to promptly file an Response to the Motion on or before the extended  
4 deadline of January 20, 2022. Undersigned counsel declare that this Stipulation is made in good faith  
5 with the intention of conserving time and resources of the parties and the Court, and request that the  
6 Court enter an order granting the extension of time. This is the first request of Defendants to extend  
7 time to file their Response to the Motion for Remand.

8 IT IS RESPECTFULLY SUBMITTED.  
9  
10 DATED this 6th day of January, 2022.  
11  
12 MESSNER REEVES LLP JENNINGS & FULTON, LTD.  
13 By /s/Renee Finch, Esq. By /s/Logan Willson, Esq.  
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17  
18 \*Admitted *pro hac vice*  
19  
20  
21 Good cause appearing, IT IS SO ORDERED. The deadline to respond to the motion  
22 to remand [12] is EXTENDED to January 20, 2022.  
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U.S. District Judge Jennifer A. Dorsey  
Dated: January 12, 2022